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December 9, 2022

Hon. Lewis J. Liman, U.S.D.J.
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Via ECF

Re: **689 Eatery Corp., etc. et ano. v. City of New York, et al.,**
Docket No. 02 CV 4431 (LJL) (“Action No. 1”)

59 Murray Enterprises, Inc. etc., et ano. v. City of New York, et al.,
Docket No. 02 CV 4432 (LJL) (“Action No. 2”)

Club at 60th Street, et al. v. City of New York
Docket No. 02 CV 8333 (LJL) (“Action No. 3”)

336 LLC, etc, et al. v. City of New York
Docket No. 18 CV 3732 (LJL) (“Action No. 4”)

Dear Judge Liman:

We represent the Plaintiffs in the above-referenced Action No. 2 and write on behalf of the Plaintiffs and Defendants in each of the related cases listed above to request an extension of time to file the supplement stipulation of facts presently due today, December 9, 2022.

Counsel for plaintiffs and defendants have been working diligently on the proposed supplemental stipulation. Plaintiffs’ counsel provided a draft on December 2nd. A detailed counterproposal was circulated by the City’s attorneys on December 7th, but Jennifer Kinsley, lead counsel for plaintiffs in regard to the stipulation, had surgery the same day and has not yet sufficiently recovered to review and resume discussion of the counterproposal on behalf of plaintiffs. We are further advised that the most

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knowledgeable City personnel regarding these issues will be unavailable from today through December 19, 2022.

Under the circumstances, we respectfully request, on consent, an extension of the December 9th deadline to December 23, 2022.

Respectfully,
Edward S. Rudofsky
Edward S. Rudofsky

Cc: All Counsel (Via ECF)